

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 1:25-MJ-04052
)	
ALLISEN WERNER,)	
Defendant.)	

MOTION TO MODIFY RELEASE CONDITION

Allisen Werner by and through counsel, requests that her release conditions be modified to permit her to travel by commercial airline for the purposes of attending her initial appearance in case 3:25-cr-00034, which is schedule for March 19, 2025 at 10:00 AM. Pursuant to Local Rule 7.1, counsel for the defendant emailed assigned counsel for the government on March 5th and March 7th and has not received a response. The Eastern District of Michigan's Pretrial Services did not take a position on the motion.

As grounds for this request, Ms. Werner submits that at her initial appearance on March 3, 2025, this Court ordered her released on a \$5,000 unsecured bond. Pertinent to this motion, Ms. Werner release conditions restrict her travel to the Eastern District of Michigan and the Western District of North Carolina. She is further restricted from commercial air travel without leave of the Court. Since her release, Ms. Werner has complied with all the terms set by the Court and Pretrial Services and has traveled back to Michigan without issue.

She now seeks leave to travel roundtrip to Charlotte, NC by commercial airline from March 18, 2025 – March 20, 2025, for the purpose attending her initial appearance. Ms. Werner will provide Probation with her travel itinerary and lodging information at least 72 hours prior to her departure.

For these reasons, and any other the Court deems just, Ms. Werner requests that the Court modify her release conditions to permit her to attend her initial appearance.

Respectfully submitted,
Allisen Werner
By her Attorney:

DATED: March 11, 2025

/s/ Curtis Pouliot-Alvarez
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CERTIFICATE OF SERVICE

I hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 11, 2025.

/s/ Curtis Pouliot-Alvarez
Curtis Pouliot-Alvarez